

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CRIMINAL NO. 15-4268 JB
	)	
vs.	)	
	)	
ANGEL DELEON, et al.,	)	
	)	
Defendants.	)	

**UNITED STATES' UNOPPOSED MOTION FOR AN EXTENSION OF TIME  
TO RESPOND TO DEFENDANT DANIEL SANCHEZ'S MOTION  
TO COMPEL THE GOVERNMENT TO COMPLY WITH RULE 16 IN NOTICING ITS  
INTENT TO RELY ON GANG EXPERT WITNESS TESTIMONY OR, IN THE  
ALTERNATIVE, TO EXCLUDE THE GOVERNMENT'S GANG EXPERT  
WITNESSES ALTOGETHER [DOC. 1345]**

The United States of America moves this Court under D.N.M.LR-Cr. 47.8(a) for an extension of time in which to file its response to Defendant Daniel Sanchez's Motion to Compel the Government to Comply with Rule 16 in Noticing its Intent to Rely on Gang Expert Witness Testimony or, in the Alternative, to Exclude the Government's Gang Expert Witnesses Altogether [Doc. 1345].

1. On October 20, 2017, Defendant Daniel Sanchez filed the aforementioned Motion.
2. Additional time is needed to complete the United States' response.
3. The United States, under D.N.M.LR-Cr. 47.1, sought the position of defense counsel for Defendant Daniel Sanchez and they do not oppose this motion. Additionally, Counsel for co-defendants do not oppose this motion.<sup>1</sup>

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<sup>1</sup> The United States sent an email asking all counsel to respond with opposition by 4:30 pm on November 3, 2017, or the United States would assume there was no opposition. Counsel either responded that they did not oppose this extension, or did not respond.

**WHEREFORE**, the United States respectfully requests that this Court grant the United States an extension of time in which to file its response to Defendant Daniel Sanchez's Motion to Compel the Government to Comply with Rule 16 in Noticing its Intent to Rely on Gang Expert Witness Testimony or, in the Alternative, to Exclude the Government's Gang Expert Witnesses Altogether [Doc. 1345], until **November 13, 2017**.

Respectfully submitted,

JAMES D. TIERNEY  
Acting United States Attorney

**Electronically Filed 11/3/2017**  
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I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification to defense counsel of record.

\_\_\_\_\_/s/  
MARIA Y. ARMIJO  
Assistant United States Attorney